

**Federal Defenders
OF NEW YORK, INC.**

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March 14, 2023

BY ECF

The Honorable J. Paul Oetken
Southern District of New York
United States Courthouse
40 Foley Square, Rm. 706
New York, New York 10007

Re: **United States v. Joshua Cheatham**
23 CR 0027 (JPO)

Dear Judge Oetken:

Joshua Cheatham, through undersigned counsel, respectfully submits this letter to request authorization to travel to New Jersey from Friday, March 17, 2023 through Monday, March 20, 2023. The purpose of this travel is to attend the viewing, funeral service, and burial for his uncle, Willie J. Cheatham. The viewing will take place on Friday, March 17, 2023 at Eternity Funeral Services in Englewood, NJ. The funeral service and burial will take place on Saturday, March 18, 2023 at Ebeneezer Baptist Church in Englewood, NJ and at Brigadier General William C. Doyle Memorial Cemetery in Wrightstown, NJ. Mr. Cheatham would then remain with his family through Monday, March 20, 2023. During this entire period (March 17 - March 20), Mr. Cheatham would be staying with his mother in Jersey City, NJ.

Pretrial Services has no objection to Mr. Cheatham traveling to and from New Jersey this upcoming weekend, but objects to any form of overnight stay. The Government defers to Pretrial Services. The Court, however, should reject this arbitrary restriction.

Importantly, this Court recently granted Mr. Cheatham permission to travel to and remain overnight with his mother in Jersey City, NJ from February 17, 2023 through February 19, 2023. *See* Dkt. 21. And prior to that, Magistrate Judge Gorenstein granted Mr. Cheatham identical permission from December 24, 2022 through December 25, 2022. *See* Dkt. 16. Mr. Cheatham has thus demonstrated several times that he can be trusted to travel out of District and remain there overnight. He asks the Court to extend this trust an additional time. Accordingly, Mr. Cheatham respectfully requests that the Court grant him permission to travel to New Jersey from Friday, March 17, 2023 through Monday, March 20, 2023 and remain there overnight during this time at his mother's home in Jersey City, NJ.

Respectfully Submitted,

/s/

Kristoff I. Williams
Assistant Federal Defender
Federal Defenders of New York
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Cc: United States Pretrial Services Officer Francesca Piperato (via email);
Assistant United States Attorney Jacob Gutwillig (via ECF)

Granted.

Permission to travel to the District of New Jersey, including overnight stay, from March 17, 2023 to March 20, 2023, is hereby approved.

So ordered.

3/15/2023



J. PAUL OETKEN
United States District Judge